

Exhibit A

IN THE UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF NEW YORK

-----x

ULKU ROWE,

Plaintiff,

-against-

GOOGLE LLC,

Defendant.

Case No: 19-cv-08655 (JHR)

-----x

October 2, 2023

9:12 a.m.

Videotaped Deposition of NonParty
Witness PATRICIA FLORISSI, pursuant to Notice,
before CINDY A. AFANADOR, Certified Shorthand
Reporter, Registered Professional Reporter,
Certified Realtime Reporter, Registered Merit
Reporter, NYSRCR, NYSACR and Notary Public of
the State of New York.

**THIS TRANSCRIPT CONTAINS CONFIDENTIAL
PORTIONS DESIGNATED BY COUNSEL**

1 Patricia Florissi

2 joined OCTO in the office of the CTO.

3 Q. Did she say what her level was
4 when she joined?

5 A. Not at first, but I think that
6 later -- later -- sometime later I think she
7 was promoted twice since I joined.

8 Q. And so that means she would have
9 started as a level 7?

10 A. That would probably have been it.

11 Q. Did she ever express a view about
12 how she felt about starting as a level 7?

13 A. Not necessarily, nothing that
14 I -- that I would share -- that I would
15 remember to share.

16 Q. Did it surprise you to learn that
17 she had joined as a level 7?

18 A. I don't have an opinion on that.

19 Q. Would it surprise you to learn
20 that Paul Strong joined as a level 9?

21 A. I do not -- first, this is the
22 first time that I'm hearing that he was hired
23 as a level 9. I don't have an opinion. I was
24 not part of the interview process. I am
25 not -- no, I cannot comment on anything that

1 Patricia Florissi

2 happened before I joined.

3 Q. And from what you've seen, how
4 does Ms. Bennett's work compare to
5 Mr. Strong's?

6 MR. GAGE: Objection.

7 A. I'm not familiar with Paul
8 Strong's work.

9 Q. Does he seem to have as an
10 expansive role as Ms. Bennett?

11 MR. GAGE: Objection.

12 A. I don't want to comment on
13 anything -- I cannot comment. I don't have
14 the groundwork to comment on whether or not
15 the work that he is doing is comparable to
16 Jenn's.

17 Q. Then Mr. Strong's work is not
18 impactful in the work that you are doing; is
19 that right?

20 MR. GAGE: Objection.

21 A. The work -- I'm not sure how the
22 work I'm doing would be impacted by Paul's
23 work.

24 Q. Are you surprised to learn that
25 Mr. Donaldson was hired as a level 9?